

RICHARD E. TANASI, ESQ.
Nevada Bar No. 9699
TANASI LAW OFFICES
601 S. Seventh Street, 2nd Floor
Las Vegas, NV 89101
Telephone: (702) 906-2411
Facsimile: (866) 299-5274
Email: rtanasi@tanasilaw.com
Attorney for Defendant Bainbridge

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,		2:16-cr-00267-JCM-CWH
<i>Plaintiff,</i>		STIPULATION AND ORDER
		TO CONTINUE SENTENCING
		HEARING (Second Request)
v.		
GARY BAINBRIDGE,		
<i>Defendant.</i>		

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by and through Kimberly Frayn, Assistant United States Attorney, GARY BAINBRIDGE, by and through his attorney, Richard E. Tanasi, Esq., that the **Sentencing Hearing** in the above-captioned matter, now scheduled for **September 19, 2018**, at the hour of 10:00 a.m., be vacated and continued to a time convenient for the Court after **January 2, 2019**.

Pursuant to General Order No. 2007-04, this Stipulation is entered into for the following reasons:

1. The parties need more time to prepare for sentencing, specifically the defendant needs more time prepare for sentencing, and to gather and investigate 18 USC 3553 materials.
2. Counsel for Mr. Bainbridge has a murder trial (State v. Matthews), on September 25, 2018, and an aggravated identity theft trial (United States v. Serban, et al), on October 30,

TANASI LAW OFFICES
601 S. Seventh St., 2nd Floor
Las Vegas, Nevada 89101
702-906-2411 • Fax 866-299-5274

1 2018. Both trials and their respective preparation conflict with an earlier sentencing-setting in
2 this case.

3 3. Mr. Bainbridge is out of custody and does not object to this continuance.

4 4. The additional time requested herein is not sought for purposes of delay.

5 5. Additionally, denial of this request for continuance could result in a miscarriage of
6 justice.

7 **WHEREFORE**, the parties respectfully request that this Honorable Court accept the
8 Stipulation and enter an Order as set forth below, continuing the sentencing hearing for date
9 convenient to the Court, after **January 2, 2019**.

10 DATED this 12th day of September, 2018.

11
12
13 U.S. ATTORNEY'S OFFICE

14 /s/
15 KIMBERLY FRAYN
16 501 Las Vegas Blvd., South
17 Suite 100
18 Las Vegas, NV 89101
19 Assistant Attorney for the UNITED STATES

20 TANASI LAW OFFICES

21 /s/
22 RICHARD E. TANASI, ESQ.
23 601 S. Seventh Street, 2nd Floor
24 Las Vegas, NV 89101
25 rtanasi@tanasilaw.com
26 Attorney for DEFENDANT BAINBRIDGE

27 ///

28 ///

///

///

///

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA, |

2:16-cr-00267-JCM-CWH

Plaintiff,

ORDER ON STIPULATION

v.
GARY BAINBRIDGE,

Defendant.

This matter coming before the Court on Stipulation to Continue Sentencing Hearing, the Court having considered the matter, and good cause showing, the Court accepts the Stipulation.

WHEREFORE, IT IS HEREBY ORDERED, that the **Sentencing Hearing** in the above-captioned matter, now scheduled for **September 19, 2018**, at the hour of 10:00 a.m., be vacated and continued to **Monday, January 7, 2019 at 10:30 a.m.**

DATED September 12, 2018.


UNITED STATES DISTRICT JUDGE

TANASI LAW OFFICES
601 S. Seventh St., 2nd Floor
Las Vegas, Nevada 89101
702-906-2411 • Fax 866-299-5274

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the ____ day of June, 2018, the undersigned served the foregoing **STIPULATION AND ORDER** on all counsel of record herein by causing a true copy thereof to be filed with the Clerk of Court using the CM/ECF system, which was served via electronic transmission by the Clerk of Court pursuant to local order.

/s/
An employee of TANASI LAW OFFICES